

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**JANNAH ALAOUI,
Plaintiff,**

v.

**UNIVERSITY OF TEXAS
HEALTH SCIENCE CENTER AT
HOUSTON,
Defendant.**

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**CIVIL ACTION NO.
4:21-cv-02549
JURY**

MOTION TO WITHDRAW AS COUNSEL TO PLAINTIFF JANNAH ALAOUI

TO THE HONORABLE DISTRICT COURT JUDGE:

Counsel Austin P. Campbell, Robert J. Wiley, Julie L. St. John and their law firms, respectfully ask this Court to allow them to withdraw as attorneys for Plaintiff Jannah Alaoui pursuant to Local Rule 83.2.

I. PROCEDURAL HISTORY

1. Plaintiff sued Defendant University of Texas Health Science Center at Houston on August 6, 2021, represented by her present counsel.
2. Plaintiff asserts claims under the Americans with Disabilities Act, as amended, and the Family and Medical Leave Act.
3. On September 7, 2021, Defendant filed a Motion to Dismiss. Plaintiff's counsel informed Plaintiff of this filing on September 8, 2021, and provided her a copy of said filing via email at that time.

II. ARGUMENT

4. There is good cause for the Court to grant this Motion to Withdraw. On September 9, 2021, Plaintiff sent an email to counsel expressing her dissatisfaction with representation, demanding a refund of all attorney fees, and threatening to file a state bar complaint.
5. Counsel has attempted to call Plaintiff as well as set up a Zoom meeting with Plaintiff. However, calls go to Plaintiff's voicemail (which is full), and counsel has been unable to get a response from Plaintiff. Counsel emailed Plaintiff to state that they would be filing this Motion to Withdraw and made a further request for an in-person, phone, or Zoom meeting but have not received a response.
6. The identity of a succeeding attorney for Plaintiff, if any, is unknown at present.
7. This Motion is not made for improper purpose or for purposes of delaying these proceedings.
8. Plaintiff's direct contact information has been provided to opposing counsel so they may reach Plaintiff directly once this Motion is granted. It is not set forth in this Motion for Plaintiff's privacy.
9. Along with this Motion, Counsel has forwarded Plaintiff a copy of Defendant's Motion to Dismiss (response deadline September 28, 2021) and Defendant's Motion to Stay (response deadline September 29, 2021). There are no other motions pending. The Rule 26(f) conference is scheduled for September 29, 2021, at 10:30am via phone.
10. The Scheduling Conference before this Court is scheduled for November 19, 2021, at 3:00pm at United States Courthouse, Courtroom 9B, 9th Floor, 515 Rusk Street, Houston, Texas 77002. Plaintiff's counsel has also provided Plaintiff the Court's Order for Conference and Disclosure of Interested Parties.

III. CONCLUSION

11. Because Plaintiff has indicated she does not wish to be represented by her present counsel, Austin P. Campbell, Robert J. Wiley, Julie L. St. John, Rob Wiley, P.C., and Wiley Wheeler, P.C., respectfully ask this Court to grant their Motion to Withdraw.

Respectfully submitted,

By: /s/ Austin P. Campbell

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served via the Court's electronic filing system on September 16, 2021, to counsel for Defendant. Copies from prior to the email conference with Defendant (see certificate of conference below) were served via email on Plaintiff on September 15, 2021, and via Priority Mail on September 16, 2021.

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Plaintiff Jannah Alaoui
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Via Email and Priority Mail

/s/ Austin P. Campbell
Austin P. Campbell

CERTIFICATE OF CONFERENCE

I certify that I conferred by email with counsel for Defendant regarding this Motion on September 16, 2021, and she indicated Defendant was unopposed. As stated in the Motion, Counsel has been unable to reach Plaintiff since receipt of her email.

/s/ Austin P. Campbell
Austin P. Campbell